

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOARD OF TRUSTEES OF THE AFTRA
RETIREMENT FUND, in its capacity as a fiduciary of
the AFTRA Retirement Fund, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Consolidated as
No. 09-cv-00686 (SAS) (DF)
ECF Case

BOARD OF TRUSTEES OF THE IMPERIAL
COUNTY EMPLOYEES' RETIREMENT SYSTEM, in
its capacity as a fiduciary of the Imperial County
Employees' Retirement System, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

THE INVESTMENT COMMITTEE OF THE
MANHATTAN AND BRONX SURFACE TRANSIT
OPERATING AUTHORITY PENSION PLAN, in its
capacity as a fiduciary of the MaBSTOA Pension Plan,
individually and on behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

PLAN OF ALLOCATION

The Net Settlement Fund will be allocated among all Authorized Claimants pursuant to the method described below.¹ Authorized Claimants are those Class Members that submit a timely and valid Acknowledgement to the Settlement Administrator (in accordance with the requirements established by the Court) that are approved for payment from the Net Settlement Fund. The Net Settlement Fund means the Settlement Fund less any: (i) Taxes; (ii) Notice and Administration Costs; (iii) Litigation Expenses awarded by the Court; (iv) Case Contribution Awards awarded by the Court; (v) attorneys' fees awarded by the Court; (vi) other Court-approved deductions; and (vii) any reduction pursuant to paragraph 8 of the Stipulation.

A. Calculation of Allocation

1. JPMC Bank has provided Lead Counsel, and Lead Counsel has in turn provided the Settlement Administrator, with: (a) each Class member's Principal Amount (*i.e.*, the principal amount of Sigma Notes held by that Class member as of September 30, 2008); (b) the identity of those Class members that owe a Sigma Collateral Deficiency (*i.e.*, the *pro rata* unrealized, or unfunded, losses incurred on the reinvestment of cash collateral in Sigma Notes); and (c) the amount of the Sigma Collateral Deficiency of the Class members that owe a Sigma Collateral Deficiency.

2. The amount of the Net Settlement Fund to which each Authorized Claimant is entitled, whether in the form of cash, credit toward a Sigma Collateral Deficiency, or a combination of the two, will be based on the *pro rata* percentage of the principal amount attributable to all Authorized Claimant's holdings of Sigma Notes as of September 30, 2008. (Net Settlement Fund x (the principal amount of each Authorized Claimant's holdings of Sigma

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Stipulation of Settlement dated March 28, 2012.

Notes as of September 30, 2008 / sum of the principal amount of the holdings of Sigma Notes as of September 30, 2008 by all Authorized Claimants)).

3. For those Authorized Claimants that *do not owe* a Sigma Collateral Deficiency, the Settlement Administrator will issue payments in cash.

4. For those Authorized Claimants that *do owe* a Sigma Collateral Deficiency, as members of the Class were advised in the Court-approved Notice, the Settlement Administrator will distribute the amount of the Net Settlement Fund to which the Authorized Claimant is entitled to JPMC Bank for the sole and exclusive purpose of satisfying, in whole or in part, that Authorized Claimant's Sigma Collateral Deficiency. The entirety of the amount of the Net Settlement Fund distributed to JPMC Bank on behalf of an Authorized Claimant that owes a Sigma Collateral Deficiency shall be credited towards that Authorized Claimant's Sigma Collateral Deficiency. If the amount of the Net Settlement Fund to which the Authorized Claimant is entitled exceeds the amount of the Authorized Claimant's Sigma Collateral Deficiency, the Settlement Administrator will distribute any excess amount owed to the Authorized Claimant in cash.

5. As members of the Class were advised in the Court-approved Notice, the tax treatment of any distribution of cash, credit towards a Sigma Collateral Deficiency, or combination of the two will vary based upon the Authorized Claimant's tax status and the treatment of his, her or its investments. The tax treatment of any distribution, credit or combination is the sole responsibility of each Authorized Claimant.

B. Distribution of Allocation

6. Prior to the Effective Date, the Settlement Fund shall remain in an interest-bearing Escrow Account, except as otherwise provided in the Stipulation of Settlement. The

Settlement Administrator shall distribute the Net Settlement Amount as promptly as possible after the Court enters the Class Distribution Order, which shall not authorize payments to Authorized Claimants prior to the Effective Date.